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BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

In re: Pennsylvania Power and Light Company

Robert K. Campbell
President and Chief Executive Officer
Pennsylvania Power and Light Company
Two North Ninth Street
Allentown, Pennsylvania 18101

TSCA SUBPOENA NO. 222 and
CERCLA/SARA INFORMATION REQUEST

Dear Mr. Campbell:

The Environmental Protection Agency (EPA) has determined that it is appropriate to compile and evaluate information relating to the possible polychlorinated biphenyl (PCB) contamination of facilities owned or operated by Pennsylvania Power and Light.

Pursuant to Section 11(c) of TSCA, 15 U.S.C. § 2610(c) and Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. & 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986, (SARA), you are hereby required to provide the information specified below to EPA within thirty (30) calendar days from your receipt of this subpoena and information request unless Ms. Nichols, the EPA representative identified below, for good cause shown, extends the date for compliance with this document.

The issuance of this document does not preclude the issuance of further actions relating to this matter to you or to any other parties.

In responding to this subpoena and information request, you should base your answers on information in your possession or reasonably available to you. Where information necessary for a complete response is neither in your possession nor reasonably available to you, indicate this fact in your response and, if possible, identify any source that either possesses or is likely to possess such information.

Your responses are required to be signed and must be attested to under oath. Your response shall be made to the EPA Representative identified on page 4 of this action, unless it contains confidential business information.

Pursuant to the regulations appearing at 40 C.F.R. Part 2, Subpart B, you are entitled to assert a business confidentiality claim covering any part of the submitted information. Unless such a confidentiality claim is asserted at the time the required information is submitted, EPA may make this information available to the public without further notice to you. Information subject to a business confidentiality claim may be made available to the public only to the extent set forth in the above-cited regulations. Any such claim for confidentiality must conform to the requirements set forth in 40 C.F.R. § 2.203(b).

If any portion of your response to this action contains information which you claim as business confidential, it is recommended that you submit that portion of the response in accordance with the following procedures. The material itself should be marked to indicate that it is claimed confidential. It should be placed in an envelope addressed to the EPA Representative identified at the end of this action. The envelope should be marked "Confidential Business Information - To Be Opened By Addressee Only." The envelope should then be placed in a second, "outer" envelope addressed to:

Edward Cohen (3HW40)
Document Control Officer
U.S. Environmental Protection Agency
EPA - Region III
841 Chestnut Street
Philadelphia, PA 19107

The package should then be mailed, by registered mail, to Mr. Cohen.

DEFINITIONS

"PCB" and "PCBs" have the meaning contained in 40 C.F.R. § 761.3 as follows: "any chemical substance that is limited to the biphenyl molecule that has been chlorinated to varying degrees or any combination of substances which contains such substance."

"Soil" has the meaning contained in 40 C.F.R. § 761.125 as follows: "all vegetation, soils, and other ground media, including but not limited to sand, grass, gravel and oyster shells."

"Storage Area" means an area where electrical equipment designed to be used in the transmission and/or distribution of electrical power is placed for later use or disposal.

"Workshop" means an area used in the maintenance, repair, or servicing of equipment involved in the transmission and/or distribution of electrical power.

INFORMATION TO BE SUBMITTED TO EPA

1. Identify the location of facilities, substations, workshops, or storage areas currently or previously owned by Pennsylvania Power and Light, which currently or previously contained any oil-filled capacitors. In your response, identify the street address, town, county, state, and zip code of each such location. For each location, list each capacitor currently or previously kept at that location including serial number, oil volume, trade name of oil, and PCB content. State the dates and duration of time during which each such capacitor was located at each location. Include any analysis results stating PCB content of oil in the capacitors. If you do not have information to provide a precise answer to any part of this question, provide all information which bears on or relates to the question, however incomplete or imprecise.

2. In a meeting on October 21, 1987, between representatives of EPA and Pennsylvania Power and Light, the Pennsylvania Power and Light representatives informed EPA that, in the past, it has been a common practice to puncture damaged capacitors to lessen internal pressure. Identify each facility, substation, workshop or storage area at which this practice occurred. Include a list of known occurrences of

puncturing damaged capacitors, including date, capacitor serial number, and volume of oil released. Indicate whether or not the capacitor contained PCB oil. Describe cleanup measures taken, including date of cleanup, cleanup procedure used, amount and type of materials removed, method of disposal of any PCB contaminated items, and include copies of relevant disposal manifests. If you do not have information to provide a precise answer to any part of this question, provide all information which bears on or relates to the question, however incomplete or imprecise.

3. Were any samples for PCB analysis taken from soil or solid surfaces including but not limited to metals, glass, aluminum siding, enameled or laminated surfaces, wood, concrete, asphalt, and plasterboard at any facility, substation, workshop, or storage area? (It is not necessary to include samples taken by EPA Region III at the Akron substation on June 10th and 11th, 1987). If so, list the date each sample was taken, a description of the location of the sample, and the sample collection procedure. Enclose copies of results of analyses for each sample.

The failure to respond fully and truthfully to the subpoena and information request within thirty (30) calendar days of receipt of this letter, or to adequately justify such failure to respond, can result in an enforcement action by EPA pursuant to Section 11(c) of TSCA, 15 U.S.C. 82610(c), and/or Section 104 of CERCLA. Each of these statutes permit EPA to seek the imposition of penalties of up to twenty-five thousand dollars ($25,000) for each day of continued non-compliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal fines of up to $25,000 per day of violation, imprisonment up to one year, or both.

In addition, the Criminal Fine Enforcement Act of 1984, P.L. 98-596, provides for fines in excess of the amount specified in these statutes under certain circumstances.

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If you have any questions concerning this action, please contact Ms. Lisa Nichols, at (215)597-4651. Your answer should be submitted by first-class mail, or any equally reliable means, to Ms. Nichols at the following address:

Ms. Lisa Nichols (3HW41)
U.S. Environmental Protection Agency
841 Chestnut Street
Philadelphia, PA 19107

Issued in Philadelphia, Pennsylvania, this 5th day of, April, 1988.

James M. Seif
Regional Administrator
EPA Region III
Philadelphia, PA 19107

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TSCA Section 6(e) PCB Inspection

Pennsylvania Power and Light Company

Lancaster, Pennsylvania

Date of Inspection: June 10-11, 1987

EPA Representatives:

Gerard R. Donovan, Jr.
Environmental Protection Specialist

George H. Houghton
Environmental Protection Specialist

Facility Representative:

Robert Cook
Supervisory Engineer
Substation

Background

The purpose of this inspection was to document and verify the compliance status of PP&L Company with federal TSCA regulations concerning the handling, storage and disposal of PCB items (PCB Rule 40 CFR, Part 761). The facility was selected for inspection to verify their PCB Spill Cleanup in the South Akron Substation, Akron, PA.

Opening Conference

The EPA representatives met with Mr. Robert Cook at the Lancaster PP&L office on June 11, 1987 at approximately 0800, for the purpose of sampling the South Akron Substation. The EPA representatives had presented their credentials to Mr. Cook, who had signed the TSCA Notice of Inspection and the TSCA Inspection Confidentiality Notice on June 10, 1987. The EPA representatives had also explained the random soil sampling and the hexagonal grid pattern they would use for the purpose of selecting sampling points for the sampling of the spill area, which would take place on June 11, 1987 in the morning.

Description

On January 13, 1984, PP&L reported a large high voltage (200 KVAR) capacitor leak. The capacitor was located in the bank of similar capacitors in the South Akron, limited access substation. Mr. Cook also informed the EPA representatives that two other PCB spills have occurred at the South Akron substation since the spill that was being sampled for today.

The capacitor leak was estimated to be 2.5 gallons of PCB liquid. PP&L used standard clean-up procedures, i.e., removal and disposal of PCB-contaminated material as the situation demanded. Contaminated gravel was removed and the capacitor bank frame was cleaned with trichloroethane.

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PP&L standard procedure calls for clean-up to be completed within 24 hours after discovery of the spill, weather permitting. Removed materials are placed in approved drums for disposal. The drums are placed in storage in Lancaster or Hazleton, PA.

Physical Inspection Sampling

In accordance with the guidelines set by Section IV of Verification of PCB Spill Cleanup by Sampling and Analysis, the EPA representatives staked out a 19 point hexagonal sampling grid for the 9.5' x 12.7' clean-up area. This resulted in 19 soil samples. The soil samples were collected below the gravel layer at a depth of about 5" - 6" below the existing ground surface over roughly 4" square area. Each sample was collected with individual throw away plastic scoops to prevent cross contamination. Inspection documents for Receipt for Samples and documents and declaration of Confidential Business Information were completed and signed at the end of the sampling. All samples were placed in one quart glass mason jars and kept iced until delivery to the Central Regional Laboratory where they were kept refrigerated until the analyses.

A sketch and photographs of the sampling locations are included with this report.

Analysis

According to the PCB sample analysis, there were PCBs noted in all samples collected at the South Akron, PA capacitor banks, but it is not known if it is from the 1984 spill. A copy of the test results is included with this report.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
CENTRAL REGIONAL LABORATORY
839 BESTGATE ROAD
ANNAPOLIS, MARYLAND 21401

301-224-2740
FTS-922-3752

DATE: July 17, 1987

SUBJECT: PCB Analysis of PP&L Samples, TSCA
870612-04-22, (6/16/87-7/9/87)

FROM: Rosemary Kayser
Chemist

TO: Rick Dreisch
Acting Chief, Annapolis Laboratory

THRU: John Austin
Team Leader, Organic Analysis Section

The samples were analyzed for the presence of PCB's.

Sample Description:

Sample No.	Description	Results Aroclor 1016 ppm
870612-04	PP&L, S. Ackron, Pa., A-1	284
-05	PP&L, S. Ackron, Pa., A-2	7166
-06	PP&L, S. Ackron, Pa., A-3	4654
-07	PP&L, S. Ackron, Pa., B-1	256
-08	PP&L, S. Ackron, Pa., B-2	1225
-09	PP&L, S. Ackron, Pa., B-3	150
-10	PP&L, S. Ackron, Pa., B-4	53870
-11	PP&L, S. Ackron, Pa., C-1	198
-12	PP&L, S. Ackron, Pa., C-2	18
-13	PP&L, S. Ackron, Pa., C-3	165
-14	PP&L, S. Ackron, Pa., C-4	354
-15	PP&L, S. Ackron, Pa., C-5	7000
-16	PP&L, S. Ackron, Pa., D-1	10
-17	PP&L, S. Ackron, Pa., D-2	50
-18	PP&L, S. Ackron, Pa., D-3	7800
-19	PP&L, S. Ackron, Pa., D-4	9558
-20	PP&L, S. Ackron, Pa., E-1	4972
-21	PP&L, S. Ackron, Pa., E-2	23324
-22	PP&L, S. Ackron, Pa., E-3	675

Aroclor 1254 Spike 90% Recovery

RK:eep

cc: Peggy Zawodny
QCO

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Pennsylvania Power and Light
Akron, PA

OCT 2 2 1987

Background

EPA inspector conducted inspection at PP&L Akron substation to verify PCB cleanup level achieved from capacitor spill in 1984. Inspector dug 6" underneath crushed stone to take samples. High levels of PCB contamination were found.

EPA sent letter to facility enclosing sample results and PCB Spill Cleanup Policy. Facility contacts EPA to arrange meeting.

Summary of Meeting of October 21, 1987

PP&L representatives claim that PCB contamination at site is actually historic.

They stated that the standard procedure back in the '70's for damaged capacitors that had an internal pressure increase was to puncture the capacitor and allow the PCBs to flow onto the ground, so that the capacitor could be safely transported. Capacitors generally contain less than 10 gallons and are pure PCBs. This practice continued thougnout much of the '70's. They eventually found out that pressurized capacitors could be safely transported as is.)

This particular substation had a higher-than-average failure rate of 8%.

After the PCB Rule became effective in '78, PP&L cleaned each spill as it occurred, by removing roughly 6 inches of crushed stone and replacing it with clean material.

Facility representatives stated that they are fairly certain, even in the absence of definitive testing, that they have at least 40 to 45 sites in PA with PCB contamination similiar to the contamination at Akron.

PP&L is agreeable to clean this site, they wanted us to be aware that it is probably the "tip of the iceberg".

Possible Action

Get them to clean up sites as we find out about them.

Send subpoena to PP&L, and other major utilities to find out extent of practice of puncturing equipment, and contaminated sites. (I.e., identify other locations.)

Refer case(s) to Superfund for actions similiar to Texas Eastern response.

Refer to EPA HQ for direction and risk assessment, since this could be national problem.

Do nothing.

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PENNSYLVANIA POWER AND LIGHT
SUMMARY OF SUBPOENA QUESTIONS

1. Identify the locations, time period of use, volume, PCB content, etc. for each oil-filled capacitor. Include any relevant analyses.

2. Identify each known occurence that a capacitor was punctured to release pressure, if it was a PCB capacitor, and describe cleanup measures taken.

3. List information relating to any sample taken at any location for PCB analysis and enclose results.